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Thomas Spannagl, President
Systech Environmental Corporation
11397 County Road 176
Paulding, Ohio 45879

Mr. Heinz Knopf, Plant Manager
Lafarge North America
11435 County Road 176
Paulding, Ohio 45879

Re: TSCA PCB Coordinated Approval
Systech Environmental Corporation (OHD 005 048 947)
Lafarge North American (OHD 987 048 733)

Dear Messrs. Spannagl and Knopf:

The United States Environmental Protection Agency, Region 5 (U.S. EPA) hereby grants a Toxic Substances Control Act (TSCA) coordinated approval (Approval) to Systech Environmental Corporation (Systech) and Lafarge North America (Lafarge) to store and burn 1.3 million gallons of oil containing less than 50 ppm PCBs (contaminated oil) as blended fuel. The contaminated oil will be stored at the Systech facility and burned as fuel in the cement kilns at the Lafarge facility, both of which are located in Paulding, Ohio.

The contaminated oil is currently stored at ESI Environmental, Inc. (ESI) located at 4910 West 86th Street, in Indianapolis, Indiana. The contaminated oil is considered regulated for disposal as PCB waste since some of the oil may have come in contact with a shipment received by ESI found to contain PCBs at a concentration greater than 50 ppm.

This approval includes the terms and conditions in this letter, the conditions described in Systech's Resource Conservation and Recovery Act (RCRA) Part B operating permit for storing and blending hazardous waste, and the conditions under Lafarge's Title V air

permit for burning hazardous waste in the cement kilns, both of which were issued by the Ohio Environmental Protection Agency (OEPA).

In granting this approval, we considered the following information:

1. The Federal PCB regulations at 40 C.F.R. §761.20(e) which allows waste oil with less than 50 ppm PCBs to be burned as a fuel in industrial furnaces and boilers.
2. Systech's and Lafarge's request for a TSCA coordinated approval to store, blend and burn the contaminated oil currently stored at ESI.
3. Systech's Notification of PCB Activity as a PCB storer dated October 17, 2007.
4. Lafarge's Notification of PCB Activity as a disposer dated October 29, 2007.
5. Systech's RCRA Part B operating permit issued by the Ohio EPA on August 8, 2003 and expiring on August 8, 2013.
6. Lafarge's final Title V Chapter 3745-77 air permit issued by the Ohio EPA on June 18, 2003 and expiring on July 9, 2008.
7. Lafarge's demonstration that the hydrocarbon emissions do not exceed the hydrocarbon emission standard established during the August 1998 Trial Burn of Cement Kiln # 1. An emission re-certification of compliance test was completed for Kiln # 2 in 1995.
8. Systech is a subsidiary of Lafarge, they are located immediately next to each other, and Systech routinely stores and directly feeds fuel oil for and to Lafarge.
- 9.. The Federal PCB regulations at 40 C.F.R. §761.20(c)(2)(iii) which allows processing, diluting or otherwise blending of waste prior to being introduced into a disposal unit in order to meet PCB concentration requirements if it is done in accordance with a TSCA PCB disposal approval.

This approval is effective immediately and is granted with the following terms and conditions:

1. Systech must follow the procedures described in the waste analysis plan and the terms and conditions of its existing RCRA Part B operating permit issued by the Ohio EPA. Any material that has a PCB concentration of equal to or greater than 50 ppm must be rejected and returned to ESI.
2. Systech must store the contaminated oil from ESI in tanks OL-4, OL-7, OL-8, as designated in its application for a TSCA coordinated approval dated September 25, 2007.

3. Systech must blend the contaminated oil from ESI as described in Lafarge's Title V permit Condition II.2. Operational Restriction to meet the specifications of the blended waste-derived fuel to be burned in Lafarge's Kilns # 1 and # 2.
4. Systech must sample and analyze for PCBs any blended fuel fed to the Lafarge's kilns during start up to assure compliance with Condition 5 of this approval.
5. Lafarge may feed the contaminated oil during start up of the kilns as long as the blended fuel contains less than 2 ppm PCBs.
6. Lafarge may burn the blended contaminated oil in Kilns # 1 and # 2 following the procedure and operational restriction specified in its Title V air permit.
7. Lafarge must maintain all records specified in its Title V air permit and required under 40 CFR Section 761.180 (b). In addition, Lafarge and Systech must maintain the analytical results of the sampling required by Condition 4 of this approval for three years.
8. Systech must decontaminate its tanks and piping system by circulating 15,000 gallons (10% of its largest tank volume) of blended fuel containing less than 2 ppm PCBs and burning them in kilns # 1 and # 2.
10. This approval expires when the 1.5 million gallons of oil currently stored in ESI and the additional waste oil used for decontamination have been burned. Lafarge/Systech must notify the Chief of the Toxics Section, at the above address, of the progress in burning the contaminated oil each month this approval is in effect.

This approval is granted in accordance with the federal PCB regulations at 40 C.F.R. §761.77. Under 40 C.F.R. §761.77, an approval may be issued to dispose PCB waste if an owner or operator of a facility has a waste management permit exercising control over the PCB wastes which was issued by a state program approved by the U.S. EPA and is no less stringent than the Federal PCB regulations. For the purpose of this approval and in accordance with 40 C.F.R. §761.77(b)(3), the requirement to comply with the PCB incinerator standards at 40 C.F.R. §761.70 is being waived, and instead, the terms and conditions in this letter are being applied. The terms and conditions are based on the requirements for burners of used oil for energy recovery at 40 C.F.R. §761.20(e).

Lafarge and Systech are responsible for assuring that any person conducting storage or disposal activities under this approval must take necessary measures to protect against the direct release of PCBs to the environment and that persons participating in the storage and disposal activities must wear protective clothing, or use equipment to protect against dermal or inhalation of PCBs or materials containing PCBs.

This approval is effective as of the date of this letter. Any departure from the conditions of this approval must receive prior written authorization from U.S. EPA. This approval may be suspended or revoked at any time when U.S. EPA have reason to believe that the continued burning of the oil presents an unreasonable risk to human health and the environment. This approval does not relieve Lafarge or Systech from complying with all other applicable federal, state and local regulatory requirements and does not preclude U.S. EPA from initiating any enforcement action, including an action seeking civil penalties, for any violation.

If you have any questions, please contact Tony Martig, of my staff at (312) 353-2291.

Sincerely,

Margaret M. Guerriero, Director
Land and Chemicals Division

cc: T. Gawlik, ESI
J. Mensinger, Systech
B. Fogle, Lafarge
A. Heller, Ohio EPA
M. Smidi, Ohio EPA
G. Ritchotte, IDEM